

The Honorable Michelle L. Peterson

CERTIFIED TRUE COPY  
ATTEST: RAJU SUBRAMANIAN  
Clerk, U.S. District Court  
Western District of Washington  
By \_\_\_\_\_ Deputy



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

| NO. MJ21-662

**Plaintiff,**

**COMPLAINT FOR VIOLATIONS:  
18 U.S.C. § 2241(c)  
18 U.S.C. § 2251(a), (e)**

v.

SHABNAM DAWN PILISUK,

**Defendant.**

BEFORE, the Honorable Michelle L. Peterson, United States Magistrate Judge, U.S. Courthouse, Seattle, Washington.

## **COUNT 1**

**(Aggravated Sexual Abuse of a Child under Twelve)**

Between May 1, 2017 and July 31, 2017, at King County, within the Western District of Washington, and elsewhere, SHABNAM DAWN PILISUK, crossed a state line with intent to engage in a sexual act with a person who had not attained the age of twelve years.

All in violation of Title 18, United States Code, Sections 2241(c) and 2246(2).

**COUNT 2**  
**(Production of Child Pornography)**

Between on or about September 1, 2016 and September 12, 2019, in King County, within the Western District of Washington, and elsewhere, SHABNAM DAWN PILISUK attempted to employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and transmitting any live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means or facility of interstate and foreign commerce, such visual depiction was transported and transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a), (e).

And the complainant states that this Complaint is based on the following information:

I, Special Agent Jayme McFarland, being duly sworn under oath, depose and say:

## **INTRODUCTION**

1. I am a Supervisory Special Agent with the U.S. Department of Homeland Security (DHS), Homeland Security Investigations (HSI), currently assigned to the Special Agent in Charge Seattle, Washington, field office. I have been employed by HSI since December 2010. I completed the Criminal Investigator Training Program and the HSI Special Agent Training Program located at the Federal Law Enforcement Training Center in Glynco, Georgia. My training included courses in law enforcement techniques, federal criminal statutes, conducting complex criminal investigations, physical and electronic surveillance techniques, and the execution of search and arrest warrants. During my employment as a law enforcement officer, I have attended periodic seminars, meetings, and continued training.

1           2. As part of my duties as an HSI Criminal Investigator, I investigate criminal  
2 violations relating to child exploitation and child pornography including federal  
3 violations of Title 18, United States Code §§ 2251(a), 2241(c), 2423(b) and Washington  
4 State violations of child exploitation statutes, routinely involving RCW 9.68A.050 and  
5 9.68A.070. I have received training in the area of child pornography (depictions of  
6 minors engaged in sexually explicit conduct) and child exploitation, and have observed  
7 and reviewed numerous examples of child pornography/depictions in various forms of  
8 media, including media stored on digital media storage devices such as computers,  
9 tablets, cellphones, etc. I have also participated in the execution of numerous search  
10 warrants involving investigations of child exploitation and/or child  
11 pornography/depiction offenses. I am a member of the Washington Internet Crimes  
12 Against Children (ICAC) Task Force in the Western District of Washington, and work  
13 with other federal, state, and local law enforcement personnel in the investigation and  
14 prosecution of crimes involving the sexual exploitation of children.

15           3. The facts set forth in this Complaint are based on my own personal  
16 knowledge; knowledge obtained from other individuals during my participation in this  
17 investigation, including other law enforcement officers; interviews of cooperating  
18 witnesses; review of documents and records related to this investigation; communications  
19 with others who have personal knowledge of the events and circumstances described  
20 herein; and information gained through my training and experience.

21           4. Because this Complaint is submitted for the limited purpose of establishing  
22 probable cause, it does not set forth each and every fact that I or others have learned  
23 during the course of this investigation. I have set forth only the facts that I believe are  
24 necessary to establish probable cause to believe that SHABNAM PILISUK (Hereinafter  
25 SHABNAM PILISUK) committed the offense charged, namely, Aggravated Sexual  
26 Abuse of a Minor in violation of 18 U.S.C. § 2241(c) and Production of Child  
27 Pornography in violation of 18 U.S.C. § 2251(a).

## **SUMMARY OF THE INVESTIGATION**

5. I have reviewed Seattle PD Detective Mark Misiorek's investigation under Seattle PD case number 2019-4765. The following is a summary of that investigation as it relates to the charges alleged herein.

6. In August 2018, Seattle PD Detective Mark Misiorek met with an individual, hereinafter referred to as WITNESS, and WITNESS's attorney, relating to an investigation under SPD case number 17-146628 where WITNESS was the suspect. WITNESS reported being associated with the founder/operator of a website (hereafter WEBSITE A), whom he believed had a sexual interest in children and has access to a child. The individual reported by WITNESS was identified as SHABNAM D. PILISUK, (DOB XX/XX/1984), residing in Seattle, King County, WA. WITNESS reported that PILISUK used the name [REDACTED] on WEBSITE A.

7. WITNESS stated that WEBSITE A is free of charge but required a username and password to access the content on the site. In February 2017, WITNESS became a member on the website and quickly became online friends with PILISUK. According to WITNESS, they met in person at the observation deck of Smith Tower, located at 506 2<sup>nd</sup> Avenue in Seattle, WA in April 2017. Their friendship continued as they met a few dozen times at various locations including his apartment, PILISUK's house, and in public. During this time, WITNESS became acquainted with PILISUK's husband, Josh, and MV1, an 11-year-old boy to whom PILISUK had regular access.

8. According to WITNESS, PILISUK posted a video on WEBSITE A of herself having intercourse with her adult nephew. WITNESS said any related files they had would be in a folder, titled, [REDACTED] on their Falcon Tower seized during Seattle Police Investigation 17-146628 related to possession of depictions of minors engaged in sexually explicit conduct. [REDACTED] is another name PILISUK went by. WITNESS added that PILISUK also expressed interest in having a sexual relationship with MV1. Specifically, WITNESS reported that PILISUK was on a trip to Las Vegas, NV with her husband and MV1 in June/July 2017. Based on MV1's date of birth, MV1 was 11 years

1 old at the time. During that trip, PILISUK sent WITNESS two photographs of MV1  
2 using the chat feature on WEBSITE A. The first photograph was MV1 in their hotel  
3 room, just wearing underwear. The second photo was MV1 in their hotel room, without  
4 underwear, in which his genitals are exposed. Following the trip, and over the course of  
5 the next month, PILISUK began to disclose she was sexually active with MV1 to  
6 WITNESS. WITNESS reported PILISUK sent WITNESS a photograph of her holding  
7 MV1's penis and a video of MV1 masturbating. According to WITNESS, neither the  
8 photograph nor the video contained anybody's face.

9       9. Shortly after the Vegas trip, WITNESS described an incident in which they  
10 were on the porch at PILISUK's house with PILISUK's husband, Josh. PILISUK was  
11 inside with MV1. When a delivery driver arrived at the house with a package, PILISUK  
12 came out to the porch, approached WITNESS, and whispered, "I just gave him a  
13 blowjob." WITNESS had been on the porch with Josh and believed she was referring to  
14 MV1. WITNESS reported PILISUK purchased a "Fleshlight" sex toy for MV1 when he  
15 was 11 years old. A "Fleshlight" is an artificial vagina or anus sex toy used for  
16 masturbation. PILISUK said MV1 used too much lubricant the first time he used the toy.

17       10. WITNESS reported PILISUK allowed WITNESS to babysit MV1 without  
18 supervision at her home in Seattle and that PILISUK was aware of WITNESS's sexual  
19 interest in children. Once they were alone, MV1 reportedly told WITNESS "If we do  
20 anything, we need to film it so [PILISUK] could watch it later." WITNESS reported  
21 nothing illegal or inappropriate occurred. According to WITNESS, MV1 told WITNESS  
22 that PILISUK had given him a "blowjob" and had intercourse with him. MV1 described  
23 getting to the point of climax with PILISUK but stopped because it felt strange.

24       11. WITNESS reported they texted PILISUK in February or March of 2017,  
25 when she disclosed receiving pictures of babies being molested from [REDACTED] PILISUK  
26 said MV1 was viewing the images with her. According to WITNESS, [REDACTED] was an  
27 administrator of WEBSITE A and utilized the username ' [REDACTED]' on WEBSITE  
28 A.

1       12. In January 2019, SPD Forensic Analyst Detective Kyburz provided  
2 Detective Misiorek with an extracted folder from WITNESS' Falcon Tower recovered  
3 during a residential search warrant related to SPD Investigation 17-146628 for possession  
4 of depictions. The folder was titled [REDACTED] and stored several of depictions of a minor  
5 that appeared to be the ones WITNESS reported they received depictions of MV1 from  
6 PILISUK.

7       13. Detective Misiorek reviewed the files and described the following:

8           a. **510b1e39-1890-4383-b75e-df7594ad8941.jpg** is a close-up photo  
9 of a young male child's erect penis being held at the base by an unknown adult's thumb  
10 and index finger. The adult's fingernails are cut short. The child's penis is circumcised.  
11 The penis is not developed and there is no sign of follicle growth near his genitals. White  
bedsheets and a light-colored wall are in the background.

12           b. **D29e291f-e5aa-4c8a-ac5e-a70b6f7e1ff9.jpg** is a similar close-up  
13 photo of the male child's penis described above. This photo does not include an adult's  
14 hands, which exposes his testicles. There appears to be a glistening liquid on the child's  
right inner thigh and on the tip of his penis, which appears to be ejaculate.

15           c. **Ffaf248d-4def-4521-843e-487d420c2d7.jpg** is another close-up  
16 image of the male child's penis described above. This photo was taken from near the  
17 child's feet making it unlikely the child could have taken the image himself.

18           d. **Db280f17-14c6-4f7c-98a6-a7cfdb727646.jpg** is a photo of MV1  
19 completely naked on what appears to be a hotel bed. He is leaning back on both of his  
20 elbows and facing the camera exposing his erect penis, which is circumcised. It appears  
21 that a hotel room key is on the bed next to him. MV1's complexion, the size of his penis,  
and the bedding and background lead Detective Misiorek to believe he is also the male  
child described above in the other photos.

22       14. I have reviewed these files and concur with Detective Misiorek's  
23 description of the files.

24       15. In addition to the above-described files recovered from a Falcon Tower  
25 belonging to WITNESS, there were multiple personal photos of PILISUK from her  
26 wedding, family vacations, several pictures of MV1 at different points in his life.  
27 Because these events were all from the time before WITNESS met PILISUK, Detective  
28 Misiorek deduced that PILISUK likely sent the photos to WITNESS. Additionally,

1 Detective Misiorek located a .jpg image that is a photo of PILISUK and WITNESS  
2 together on the Smith Tower Observation Deck in Seattle, where WITNESS said they  
3 met in person for the first time in April 2017.

4       16. In March 2019, Detective Misiorek contacted King County Superior Court  
5 and obtained a legally valid search warrant for PILISUK and her residence located in  
6 Seattle, WA. Shortly after obtaining the warrant, members of the Washington State  
7 Internet Crimes Against Children Task Force executed a residential search warrant at  
8 PILISUK's home in Seattle. Several of PILISUK's electronic devices were seized and  
9 forensically examined. PILISUK was interviewed by Det. Misiorek and me, at which  
10 time she confirmed ownership of WEBSITE A and knowing WITNESS.

11       17. I have also learned the following information from the investigation of  
12 Seattle PD Det. Elizabeth Litalien regarding this case:

13       18. The data from PILISUK's devices included personal and family photos  
14 covering a period of several years. By comparing PILISUK's personal images, which  
15 included metadata of time, date, and type of device the images were taken with, SPD Det.  
16 Litalien was able to determine that MV1 was 11 years old when PILISUK first had  
17 sexual intercourse with him as described below, as well as produced, possessed, and dealt  
18 depictions of minor, specifically MV1, engaged in sexually explicit conduct.

19       19. On November 20, 2021, King County DPA Laura Harmon relayed to  
20 Seattle PD Det. Litalien a call from family law attorney Dennice Bryant. Bryant stated  
21 that MV1 disclosed to his counselor, Deborah Maudlin, that he had been raped by  
22 PILISUK. In 2019, MV1 had previously been interviewed by a child interview specialist  
23 and at that time denied any sexual contact had occurred with PILISUK.

24       20. On November 22, 2021, at approximately 1132 hours, Det. Litalien called  
25 and interviewed Maudlin. Maudlin verified that she is the family court appointed  
26 counselor for MV1. [REDACTED]

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14        22. Maudlin stated that on November 19, 2021, MV1 came to the counseling  
15 session and handed her an envelope that had a set of post it notes inside it. Maudlin stated  
16 that MV1 gave her the post its to read. Maudlin stated that [REDACTED]  
17 [REDACTED]  
18

19        23. Maudlin read the post it notes to me. She stated that they may not have  
20 been in the order they were received. The notes as read to me by Maudlin are as follows:  
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3       28. On December 15, 2021, MV1 was interviewed by Child Interview  
4 Specialist Gina Coslett. The interview was audio and video recorded. The following is  
5 my summary of that interview as described by Det. Litalien:  
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COMPLAINT/*United States v. Pilisuk* - 18

UNITED STATES ATTORNEY  
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SEATTLE, WASHINGTON 98101  
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6       46. Coslett showed MV1 the following redacted depictions Det. Litalien had  
7 provided to her before the interview. MV1 looked at the following image:

8           a. Photo 1- **99582fe5-9065-4295-ae98-8cefd73c0f86alt1.jpg** is an  
9 image of MV1 laying back on what appears to be a hotel room bed. He is propping his  
10 head up with his right hand and pulling his left leg straight into the air with his left hand.  
11 He's wearing a dark t-shirt and light blue underwear. MV1's crotch is the clear focus of  
the photo.

12           b. Photo 3- **Db280f17-14c6-4f7c-98a6-a7cfdb727646.jpg** is a photo of  
13 MV1 completely naked on what appears to be a hotel bed. He is leaning back on both of  
14 his elbows and facing the camera exposing his erect penis, which is circumcised. It  
appears that a hotel room key is on the bed next to him.

15           c. Photo 4 – **510b1e39-1890-4383-b75e-df7594ad8941.jpg**, is a close-  
16 up photo of a young male child's erect penis being held at the base by an unknown  
17 adult's thumb and index finger. The adult's fingernails are cut short. The child's penis is  
18 circumcised. The penis is not developed and there is no sign of follicle growth near his  
genitals. White bedsheets and a light-colored wall are in the background.

19           d. Photo 5-**d29e291f-e5aa-4c8a-ac5e-a70b6f7e1ff9.jpg** is a similar  
20 close-up photo of the male child's penis described above. This photo does not include an  
adult's hands and exposes his testicles. There appears to be a glistening liquid on the  
child's right inner thigh and on the tip of his penis, which appears to be ejaculate.

22           e. Photo 6-**ffaf248d-4def-4521-843e-4873d420c2d7.jpg** is another  
23 close-up image of the male child's penis described above. This photo was taken from  
24 near the child's feet making it unlikely the child could have taken the image himself.

25       47. MV1 acknowledged PILISUK produced all the above-described depictions  
26 and confirmed he is the child depicted. MV1 disclosed that it is PILISUK's hand on his  
27 penis in file Photo 4-510b1e39-1890-4383-b75e-df7594ad8941.jpg. MV1 stated that  
28 these images were taken of him by PILISUK in Las Vegas, Nevada when he was on a trip

1 with she and his stepfather Josh. He thought they may be at the same hotel or two  
2 separate hotels. MV1 stated that Josh was in the shower at the time and not aware the  
3 images were being produced.

4       48.    MV1 viewed vacation images located on PILISUK's devices and said that  
5 he believes they were from that same trip to Nevada. He told Coslett that he went on a  
6 road trip with PILISUK and Josh. MV1 drew a map of the road trip as he remembered it,  
7 showing her that they had left Washington and traveled to Oregon, Nevada and back to  
8 Washington through California. PILISUK's communications and images discovered  
9 during the investigation verify that this trip occurred in June and July of 2017. MV1  
10 stated that he believed he was 11 or 12 at the time.

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## **CONCLUSION**

49. Based on the above facts, I respectfully submit that there is probable cause to believe that SHABNAM DAWN PILISUK committed the offenses charged in Counts 1 and 2 above.

JAYME MCFARLAND, Complainant  
Supervisory Special Agent  
Homeland Security Investigations

The above-named agent provided a sworn statement attesting to the truth of the foregoing Complaint and Affidavit submitted to me by reliable electronic means pursuant to Fed. R. Crim. Proc. 4.1(a), and the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 21st day of December, 2021.

M. Peterson  
MICHELLE L. PETERSON  
United States Magistrate Judge